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Attorneys for the Plaintiffs

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

“JENNY,” “CARRIE,” “LILY,” “SARAH,”
“HENLEY,” “MAUREEN,” and “JANE
ROE” as next friend for “PIA,”

Plaintiffs,

v.

THOMAS BLAHA,

Defendant.

Case No. 2:23-cv-07051-JMA-ST

**REQUEST FOR CERTIFICATE OF
DEFAULT JUDGMENT PURSUANT TO
FED. R. CIV. P. 55(a)**

TO: BRENNNA B. MAHONEY
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Plaintiffs, through their counsel, request that the Clerk of Court enter an Order of Default against Defendant Thomas Blaha pursuant to Federal Rule of Civil Procedure 55(a) for failure to plead or otherwise defend this action as fully appears from the court file herein. In support of this request Plaintiffs rely upon the record in this case and the Declaration of Margaret E. Mabie.

Plaintiffs filed this action on September 21, 2023. (ECF No. 1, Compl. ¶ 32). Defendant was properly served on October 27, 2023. (ECF No. 7, 11). Defendant's response was due on or before November 17, 2023. To date, the Defendant has failed to appear or respond.

Plaintiffs hereby request that the Clerk enter a default judgment in the sum certain amount of \$150,000 per Plaintiff, for a total of \$1,050,000, pursuant to Fed. R. Civ. Proc. 55(b)(1), 18 U.S.C. § 2255, and District Court Local Rule 55.2(a). Furthermore, Plaintiffs seek leave to file their motion, on a future date set by the Court, for post-judgment interest pursuant to 28 U.S.C. § 1961 and an award of reasonable Attorneys' Fees and Costs pursuant to Fed. R. Civ. Proc. 55(b)(2) and 18 U.S.C. § 2255.

Dated: January 9, 2024

Respectfully submitted,

MARSH LAW FIRM PLLC

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